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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 FEDERAL NATIONAL MORTGAGE  
ASSOCIATION,

Case No. 2:17-cv-01582-MMD-KJK

12 Plaintiff,  
13 v.  
14 JAYEM FAMILY, LP,  
Defendant

**STIPULATION AND ORDER TO  
EXTEND RESPONSIVE PLEADING  
DEADLINE**

(Third Request)

17 Plaintiff FEDERAL NATIONAL MORTGAGE ASSOCIATION (“Fannie Mae”), and  
18 Defendant JAYEM FAMILY, LP (“Jayem”) (collectively referred to herein as the “Parties”), by and  
19 through their respective counsel of record, hereby stipulate and agree to extend the responsive  
20 pleading deadline to the Complaint on file herein (ECF No. 1). This is the Parties’ third request.

21       1. Jayem has retained counsel in this matter, who on September 14, 2017, accepted  
22 service of a copy of the summons and complaint on file herein.

23        2. For the past several weeks, Fannie Mae and Jayem have been in settlement discussions  
24 in an effort to resolve the title dispute to the property at issue in this case, as well as several other  
25 properties where Jayem (or its affiliates) and Fannie Mae or Freddie Mac are claiming adverse  
26 interests. The Parties believe that they are very close to a resolution in this case.

1           3. One of the goals of the settlement discussions is to save litigation costs in this action  
2 as well as other lawsuits where Jayem and Fannie Mae or Freddie Mac are parties.

3           4. The Parties obtained prior extensions in order to conduct settlement negotiations.  
4 Fortunately, as stated above, the negotiations have been productive, and the Parties are very close to  
5 an agreement. The Parties simply need more time to finalize settlement without increasing the  
6 Parties' respective litigation costs.

7           5. Given that the settlement discussions involve multiple or more than one property and  
8 lawsuit, and that time will be needed to gather and collect data for each property, the Parties  
9 anticipate it will take an additional 45 days to finalize settlement.

10          6. Accordingly, the Parties agree that good cause exists to extend Jayem's responsive  
11 pleading deadline to March 12, 2018 and the Parties hereby respectfully request that the Court enter  
12 an order confirming said deadline.

13          IT IS SO STIPULATED AND AGREED.

14          Dated: February 1, 2018

15 TAKOS LAW GROUP, LTD.

16          \_\_\_\_\_  
17          /s/ Zachary P. Takos  
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17          /s/ Jory C. Garabedian  
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21          Counsel for Plaintiff Fannie Mae

22          IT IS SO ORDERED.

23          Dated this 5<sup>th</sup> day of February, 2018.

24            
25          UNITED STATES MAGISTRATE JUDGE